## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

IN RE:

JUANITA MAE SMITH,

CASE NO. 15-00374-5-SWH CHAPTER 13

**DEBTOR** 

## **DEBTOR'S RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS**

**NOW COMES** the debtor, by and through undersigned counsel, and responds to the Motion to Dismiss filed by the Chapter 13 Trustee and shows that the debtor would like an opportunity to make payments, attend a section 341 meeting, agree to a feasible plan, and provide documents and information to the Trustee as requested.

**WHEREFORE**, debtor prays the Court that the Trustee's Motion to Dismiss be denied, that a hearing be set in this matter, and for such other and further relief as the Court deems just and proper.

Dated: April 30, 2015. /s/ Travis Sasser

Travis Sasser, State Bar No. 26707 2000 Regency Parkway, Suite 230 Cary, North Carolina 27518

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## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Debtor's Response to Trustee's Motion to Dismiss to be served on the Chapter 13 Trustee at the last known address with sufficient postage thereon, or, if such interested party is an electronic filer, by serving interested party by electronic transmission, pursuant to Local Rule 5005-4(9)(b).

Chapter 13 Trustee *Served Electronically* 

Juanita Mae Smith 4228 Dalcross Road Raleigh, NC 27610

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 30, 2015. /s/ Travis Sasser

Travis Sasser, State Bar No. 26707